

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 19-CR-02

vs.

ALEXANDER P. BEBRIS,

Defendant.

**MOTION TO TRAVEL OUTSIDE OF
EASTERN DISTRICT OF WISCONSIN**

Defendant Alexander P. Bebris, by his attorneys Jason D. Luczak and Gimbel, Reilly, Guerin & Brown, LLP, respectfully moves the court, the Honorable William C. Griesbach, presiding, for permission to travel outside of the Eastern District of Wisconsin on the following dates for the purposes noted:

1. Bebris would leave his residence on Friday, April 23, 2021, and travel to 18395 WI Hwy 55, Long Lake, WI 54542. The purpose of this travel is for a short weekend vacation.
2. Bebris would return on Sunday, April 25, 2021.
3. Bebris also requests permission to travel to West Lafayette, Indiana for his daughter's college graduation. Bebris would leave his residence on Thursday, May 13, 2021, and return Saturday, May 15, 2021. Bebris will provide the exact address to probation when he has booked a hotel.

4. Bebris will comply with all conditions of probation which remained in effect pending his appeal of the above-captioned matter.

5. Bebris will communicate with his probation agent and attorney while outside of the Eastern District of Wisconsin and will be accessible via his cell phone during his travels.

6. Bebris will contact his probation agent immediately upon his return to the Eastern District of Wisconsin to verify said return.

7. Counsel for Bebris has contacted both the Government and probation and neither party objects to these requests.

8. Probation, by agent Kevin Norman, has indicated to Counsel that Bebris's electronic monitoring bracelet will need to be deactivated during these brief periods of travel.

THEREFORE, Bebris respectfully requests this Court issue an order allowing him to travel from the Eastern District of Wisconsin to Long Lake, Wisconsin from April 23, 2021, to April 25, 2021. Bebris further requests this Court issue an order allowing him to travel from the Eastern District of Wisconsin to West Lafayette, Indiana from May 13, 2021 to May 15, 2021. Bebris also requests that each of these orders permit probation to deactivate the electronic monitoring device during these two periods of time.

Dated this 21st day of April, 2021.

Respectfully submitted,

GIMBEL, REILLY, GUERIN & BROWN, LLP

By:

s/Jason D. Luczak

JASON D. LUCZAK

State Bar No. 1070883

Email: jluczak@grgblaw.com

Attorney for Defendant

POST OFFICE ADDRESS:

Two Plaza East, Suite 1170
330 East Kilbourn Avenue
Milwaukee, Wisconsin 53202
Telephone: 414/271-1440